

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jocelyn A. Gibson

(b) County of Residence of First Listed Plaintiff Montgomery
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se

DEFENDANTSFirst Transit Inc. improperly named as First Transit
TransnorationCounty of Residence of First Listed Defendant Hamilton Co. OH
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Paul C. Troy, Esquire, Kane Pugh Knoell Troy & Kramer
510 Swede St, Norristown, PA 19401 (610) 275-2000**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. 1332Brief description of cause:
Motor Vehicle - Personal Injury**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
Excess of \$50,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

9/10/21

/s/ Paul C. Troy

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 1633 Theyer Drive, Blue Bell, PA 19422
Address of Defendant: 600 Vine St, Ste 1400, Cincinnati, OH 45202
Place of Accident, Incident or Transaction: Philadelphia, PA

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☐ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 09/10/2021 /s/ Paul C. Troy 60875
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
☐ 2. FELA
☐ 3. Jones Act-Personal Injury
☐ 4. Antitrust
☐ 5. Patent
☐ 6. Labor-Management Relations
☐ 7. Civil Rights
☐ 8. Habeas Corpus
☐ 9. Securities Act(s) Cases
☐ 10. Social Security Review Cases
☐ 11. All other Federal Question Cases
(Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
☐ 2. Airplane Personal Injury
☐ 3. Assault, Defamation
☐ 4. Marine Personal Injury
☒ 5. Motor Vehicle Personal Injury
☐ 6. Other Personal Injury (Please specify): _____
☐ 7. Products Liability
☐ 8. Products Liability – Asbestos
☐ 9. All other Diversity Cases
(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, _____, counsel of record or pro se plaintiff, do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:
☐ Relief other than monetary damages is sought.

DATE: _____ Sign here if applicable
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

APPENDIX I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

JOCELYN A. GIBSON	:	CIVIL ACTION
	:	
v.	:	
	:	
FIRST TRANSIT TRANSPORTATION	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

9/10/21
Date

Paul C. Troy, Esquire
Attorney-at-law

First Transit Inc.
Attorney for

610-275-2000
Telephone

610-275-2018
FAX Number

ptroy@kanepugh.com
E-Mail Address

(Civ. 660) 10/02

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: PAUL C. TROY, ESQUIRE

ATTORNEY I.D. NO. 60875

Attorney for Defendant

510 SWEDE STREET

NORRISTOWN, PA 19401

(610) 275-2000

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOCELYN A. GIBSON

:

No.

:

v.

:

CIVIL ACTION

:

FIRST TRANSIT TRANSPORTATION

:

NOTICE OF REMOVAL OF DEFENDANT

Defendant, First Transit, Inc., improperly named as First Transit Transportation, by and through its attorneys, Kane, Pugh, Knoell, Troy & Kramer, LLP, gives notice of the removal of the above captioned action to this Court of a Civil Action pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof avers as follows:

1. A civil action has been brought against Defendant by the Plaintiff in the Court of Common Pleas of Philadelphia County at No. 210700575. A copy of that Complaint is attached hereto as Exhibit "A."

2. This is an action over which the Court has original jurisdiction pursuant to 28 U.S.C. § 1332, because it is a civil action between citizens of different states and exceeds the required amount in controversy, exclusive of interest and costs pursuant to 28 U.S.C. § 1332.

3. The State Court where the action was originally filed is located in Philadelphia County, Pennsylvania, which is embraced within this judicial district.

4. The Plaintiff is, at the time of the filing of this action, a citizen of the Commonwealth of Pennsylvania.

5. Defendant, First Transit, Inc., improperly named as First Transit Transportation is a Delaware corporation with a corporate headquarters located at 600 Vine Street, Suite 1400, Cincinnati, Ohio.

6. In her Complaint, Plaintiff alleges she suffered injuries which are serious or permanent in nature and which have in the past and will in the future cause great pain and suffering and serious impairment of bodily function. Plaintiff also alleges she incurred various and substantial expenses which were reasonable and necessary for her treatment and care and will be required to incur such expenses into the future. Plaintiff alleges she has suffered a severe loss of earnings and/or impediment of her earnings. *See* Exhibit A at ¶¶ 8-13.

7. Plaintiff alleges damages in an unspecified amount, but the demand of which, upon information and belief, exceeds the statutory jurisdictional limit, together with costs of this action and damages for delay.

8. By reason of the foregoing, a removal of the action to this Court is proper, under 28 U.S.C. §§ 1332(a), 1441(a).

9. The statutory requirements having been met, the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

BY: /s/Paul C. Troy
PAUL C. TROY, ESQUIRE
Attorney for Defendant

EXHIBIT A

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA

CMPLT-Gibson Vs First Transit Transportation



21070057500011

Jacelyn Justin Gibson

vs
First Transit

2107-00575

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

Jocelyn Austin Sibert
vs
First Transit Transportation
210700575

Complaint in MVA

1. Plaintiff Jocelyn Austin Sibert is an adult citizen of the Commonwealth of Penna. and at all times resides at 1633 Thayer Drive Blue Bell, Pa 19422
2. Defendant First Transit a company of the Commonwealth of Penna.
3. At all times relevant hereto, defendant First Transit owned, operates and controlled the vehicle involved in the accident of 9 July 2019.
4. On 9 July 2019, Ms. Sibert took a ride on First Transit / Septa C&T coming from her home 1607 Reservoir Ave. Willow Grove, Pa 19090 going to 1100 Walnut St. Dr. Ernest Roxato's office.

48. During that trip my driver made an abrupt stop launching Ms. Gibson against the handlebar (16"x5") attached to the wall. This bar was supposed to be used as support when standing.

The incident happened between,

just after Vine St. Because of the design of the Van it was impossible for Ms. Gibson to see or say what made the driver stop so quickly. The driver was going rather fast onto that small, people packed street. Ms. Gibson was sitting in the single chair directly behind the wheelchair lift. This lift blocked her view. When the driver slammed on his brakes Ms. Gibson hit against the vehicles safety bar and safety belt. The belt not preventing Ms. Gibson from contact with the safety/handlebar that was placed against the wall of the van. At the same time Ms. Gibson's right side slammed against THE BAR and the front of the lift on her right side.

5. The aforesaid accident was due solely to the negligence and carelessness of the defendant. This accident was due in no manner whatsoever to any act or failure to act on the part of Jocelyn Justin Sibers.

6. Plaintiff incorporates by reference paragraphs 1 through — of plaintiff's complaint as if fully set forth herein at length.

7. The accident and injuries were caused by the carelessness and negligence of defendant First Transit, acting as aforesaid and consisted inter alia of the following:

(a) Failing to have their vehicle under proper control so as to avoid a sudden and dangerous stop;

(b) Failing to keep a proper lookout;

(c) Failing to avoid/cause an accident;

(d) Failing to cause an accident;

(e) Failing to make a proper application of the brakes;

(f) Failing to observe that which was clearly before the driver;

(g) Failing to use wisdom in speed of vehicle on crowded street;

(h) Failing to use wisdom or due caution in driving said vehicle on a city street;

(i) Failing to warn Plaintiff Jacobyn A. Suber; and

(j) Failing to remove a dangerous obstruction from the vehicle;

(k) Failing to provide safe handlebars for the disabled;

(l) Failing to provide safe handlebars on a vehicle used to transport the disabled;

7(m) Failing to remove a dangerous item that caused injury;

(a) Defendant, First Transit, and their employer, SEPTA CCT failed to report this accident to SEPTA POLICE for investigation;

(b) Defendant, First Transit, and their employer, SEPTA CCT failed to provide timely medical help for plaintiff, Jocelyn A. Suber;

(c) Defendant, First Transit, and their employer, failed to report said accident to the Philadelphia Police;

8. Solely, as a result of the negligence and carelessness of defendant, First Transit, Plaintiff Jocelyn A. Gibson has suffered injuries which are serious or permanent in nature; including but are not limited to post-traumatic disorder, right flank pain, right flank lipomas (3); surgery needed to remove lipomas; post surgical pain, severe pain due to not being treated. All of which have in the past and will in the future cause Plaintiff Jocelyn A. Gibson great pain and suffering and further has caused and will cause in the future body modification and a serious impairment of bodily function.

9. As a further result of the negligence and total carelessness of defendant First Transit, Plaintiff Jocelyn A. Gibney has been or will be required to receive and undergo medical attention and care and to expend various sums of money and to incur such expenditures for an indefinite time in the future.

10. As a result of the carelessness and negligence of defendant First Transit plaintiff Jocelyn A. Gibner has a medically determinable physical impairment which prevents plaintiff Jocelyn A. Gibner from adequately performing all or substantially all of the material acts and duties which constituted plaintiff Jocelyn A. Gibner's usual and customary activities prior to the accident.

11. As a further result of the negligence and carelessness of defendant East Transit, Plaintiff Jocelyn A. Gibson has or may hereinafter incur other financial expenses, which do or may exceed amounts which Plaintiff Jocelyn A. Gibson may otherwise be entitled to recover including payment for medical bills.

12. As a direct result of negligence and carelessness of defendant First Transit plaintiff Jocelyn A. Jivon has or may hereinafter suffer physical pain, mental anguish, humiliation and embarrassment and she may continue to suffer same for an indefinite time in the future

13. As a direct result of the negligence and carelessness of defendant First Transit plaintiff Jocelyn A. Gibson has and may suffer a severe loss of earnings and or impairment of her earnings, which lost of such loss of her earnings, which lost of such loss of income and/or impairment of her recovery earning capacity has or may exceed the sum recoverable under the limitations of Pennsylvania Financial Responsibility Act.

Wherefore, plaintiff Jocelyn A. Gibson demands judgement against defendant First Transit in an amount in excess of \$50,000 together with all cost, expenses, attorney's fees and other amounts deemed appropriate by this Honorable Court.

BY

Jocelyn Austin Gibson

Jocelyn Austin Gibson
Pro Se Plaintiff

Verification

I, Jacelyn Austin Gibson, hereby verify that I am the Plaintiff in this cause of action and verify that the statements made in the foregoing COMPLAINT IN CIVIL ACTION are true and correct to the best of my knowledge, information and belief. I understand that the statements therein are made subject to the penalties of 18 PA C.S.A. § 4904 relating to unsuborn falsification to authorities

Jacelyn Austin Gibson

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: PAUL C. TROY, ESQUIRE

ATTORNEY I.D. NO. 60875

510 SWEDE STREET

NORRISTOWN, PA 19401

(610) 275-2000

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOCELYN A. GIBSON

:

No.

vs.

:

CIVIL ACTION

FIRST TRANSIT TRANSPORTATION

:

**DEFENDANT'S CERTIFICATE OF FILING OF
COPY OF NOTICE OF REMOVAL WITH THE STATE COURT**

I, PAUL C. TROY, ESQUIRE, counsel for defendant First Transit Transportation, hereby certify that on this date a certified copy of Defendant's Notice of Removal will be filed with the Office of Judicial Records of the Court of Common Pleas of Philadelphia County, Pennsylvania, wherein is pending the State Court action which is the subject of the removal.

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: /s/ Paul C. Troy

PAUL C. TROY, ESQUIRE

Date: 9/10/2021

KANE, PUGH, KNOELL, TROY & KRAMER LLP

BY: PAUL C. TROY, ESQUIRE

ATTORNEY I.D. NO. 60875

510 SWEDE STREET

NORRISTOWN, PA 19401

(610) 275-2000

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOCELYN A. GIBSON

:

No.

vs.

:

CIVIL ACTION

FIRST TRANSIT TRANSPORTATION

:

CERTIFICATE OF SERVICE

I, Paul C. Troy, certify that on this date I served a true and correct copy of the Notice of Removal in the above-captioned matter on all counsel of record and unrepresented parties via email and U.S. First Class Mail, postage prepaid, as follows:

Jocelyn A. Gibson
1633 Thayer Drive
Penllyn, PA 19422
austinsprty@gmail.com

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: /s/ Paul C. Troy

PAUL C. TROY, ESQUIRE

Date: 9/10/2021